

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

DANIELA GOZES-WAGNER

Case No. 4:14-cr-637-04

Exhibit List of the United States

The United States of America files this Exhibit List and, in conjunction with Local Rule 55.2, notifies that it may use the listed exhibits.

Respectfully submitted,

Abe Martinez
Acting United States Attorney

/S/

Michael Chu
Jim McAlister
Assistant U.S. Attorneys

Exhibit List of the United States

No.	Description	Off.	Obj.	Adm.	N/Adm
1.	Summary chart of clinics				
2.	Binder of pre-signed physicians forms for: <ul style="list-style-type: none"> • Southwest Healthcare & Diagnostics (Dr. Faiz Ahmed, Dr. Daniel Tuft, PA Michael Riley, Ingela Danielsson) • Albert Davies, M.D. • Dennis Barson, D.O. • Ronald Bryant, M.D. • Muhammad Emran, • Wasim Khan, M.D. • Jack McCoy • Advance Regency • Joseph Vadas, M.D. • Care Plus Clinic, Inc. (Victor Flagiello, D.O.) • 7111 Medical Clinic (Anh Do) • Minh Le, 				
3-a to 3-c	Pictures of deposit stamps: (FBI Box G225) (a) Gulfton Healthcare Inc. xxxxx6103 (b) Village Diagnostic Clinic xxxxxx1240 (c) Care Plus Clinic Inc. xxxxxx7456				
4.	Pictures of deposit stamps: (FBI Box G225) <ul style="list-style-type: none"> • Horizon Multi-Specialty Group Inc., Wells Fargo Bank 3664 • Asclepius Medical Group Inc. Wells Fargo Bank 4964 • Life Span Clinic Inc., Wells Fargo Bank 8235 • Life Span Clinic Inc., Wells Fargo Bank 8235 				

No.	Description	Off.	Obj.	Adm.	N/Adm
5.	Deposit stamps: (FBI Box G225) <ul style="list-style-type: none"> • SORS Medical Group Inc., Wells Fargo Bank 8834 • Orcus Medical Imaging, Inc. Wells Fargo Bank 8842 • Feronia Medical Clinic Inc. Wells Fargo Bank 2019 • ANA Diagnostic Center Inc Wells Fargo Bank 5985 				
6.	Deposit stamp: Apollo Outpatient Services Inc., Compass Bank 6017 (FBI Box G225)				
7.	List for Daniela (spreadsheet of beneficiaries and doctors for Daniela) pp. 1 to 39, 46-49, 51-59 (FBI Box G230)				
-b	List for Daniela 6-10-13 pp. 40-43 (FBI Box G230)				
-c	1-17-14 email from Daniela Wagner (Daniela@MobileMedicalClinic.net) re: address changes for chart of clinics. p.44 (FBI Box G230)				
8.	Handwritten note entitled "Office's Information," listing information for Gulfon, Advanced Regency, Hillcroft, Preferred Diagnostics, Village Diagnostic, Doctor's Preferred, 7111 Medical Clinic, Care Plus Clinic, Southwest Healthcare & Diagnostics, Dr. Joseph Vadas, (FBI Box G298)				
8-a	Picture of "Office's Information" as it was found (FBI Box G298)				

No.	Description	Off.	Obj.	Adm.	N/Adm
9.	Chart of bank account login credentials for Apollo Outpatient Services, Orcus Medical Imaging, SORS Medical Group, Tellus Healthcare Group, Feronia Medical Clinic, Care Plus Clinic, Village Diagnostics, 7111 Medical Clinic, Gulfton Healthcare, Doctor's Preferred Diagnostic, Horizon, Webtranscribing (FBI Box G298)				
10.	Chart Setup (FBI Box G230)				
12.	Chart of clinics, locations, owners, doctors, and employees (FBI Box 230)				
13.	Reserved				
15.	Folder pre-filled Apollo SORS forms (FBI Box G230) 15 Excerpt of folder 15-a left side of folder 15-b right side of folder				
16.	Reserved				
17.	Reserved				
18.	Receipts for Tax prep clinics (FBI Box G230)				
19.	Voided checks for Village Diagnostic Clinic, Inc., Gulfton Healthcare, Inc. (pre-signed), Doctor's Preferred Diagnostics, Inc., 7111 Medical Clinic, Inc., Care Plus Clinic, Inc. (FBI Box G265)				
21.	Reserved				

No.	Description	Off.	Obj.	Adm.	N/Adm
22-a to 22-i	Booklets of deposit tickets for: -a ANA Diagnostic Center Inc. -b Apollo Outpatient Services Inc. -c Asclepius Medical Group Inc. -d Feronia Medical Clinic Inc. -e Horizon Multi-Specialty Group Inc. -f Life Span Clinic Inc. -g Orcus Medical Imaging, Inc. -h SORS Medical Group, Inc. -i Village Diagnostic Clinic, Inc. (FBI Box G242)				
23.	Keys in envelope (FBI Box G220) <ul style="list-style-type: none"> Envelope marked “Daniela” “Suite 194 10101 Harwin Village Diagnostic Clinic” (key inside). Envelope marked “7111 Har 255-D” (key inside). Envelope marked “474S” (key inside). Key 415S Key 626 				
24.	Binder of pre-signed checks: 7111 Medical Clinic, Inc. (FBI Box G165)				
25.	Binder of pre-signed checks: ANA Diagnostic Center (FBI Box G236)				
-a	Starter checks for ANA Diagnostic Center				
26.	Binder of pre-signed checks: Apollo Outpatient Services Inc. (FBI Box G236)				
27.	Binder of pre-signed checks: Care Plus Clinic, Inc. (FBI Box G236)				
28.	Pre-signed starter checks for Dallas Integrated Medical Center (FBI Box G236)				

No.	Description	Off.	Obj.	Adm.	N/Adm
29.	Binder of pre-signed checks: Doctors Preferred Diagnostics (FBI Box G165)				
30.	Binder of pre-signed checks: Feronia Medical Clinic Inc. (FBI Box G236)				
31.	Binder of pre-signed checks: Gulfton Healthcare, Inc. (FBI Box G165)				
32.	Binder of pre-signed checks: Horizon Multi-Specialty Group, Inc. (FBI Box G165)				
33.	Binder of checks: Indira Healthcare Services (FBI Box G236)				
34.	Binder of pre-signed checks: Life Span Clinic, Inc. (FBI Box G165)				
35.	Binder of pre-signed checks: Orcus Medical Imaging, Inc. (FBI Box G165)				
36.	Binder of pre-signed checks: SORS Medical Group, Inc. (FBI Box G165)				
37.	Binder of pre-signed checks: Tellus Healthcare Group, Inc. (FBI Box G165)				
38.	Binder of pre-signed checks: Village Diagnostic Clinic, Inc. (FBI Box G236)				
39.	Binder of pre-signed checks: West H Family Clinic, Ltd. (FBI Box G165)				
40.	Corporate records 7111 Medical Clinic, Inc. (FBI Box G219)				
41.	Corporate records Care Plus Clinic, Inc. (FBI Box G219)				

No.	Description	Off.	Obj.	Adm.	N/Adm
42.	Corporate records Doctors Preferred Diagnostics, Inc. (FBI Box G219)				
43.	Corporate records Gulfon Healthcare, Inc. (FBI Box G219)				
44.	Corporate records Village Diagnostic Clinic, Inc. (FBI Box G219)				
46-A to - G	Binder entitled, "Dallas Integrated Medical Center, Inc." (FBI Box G131)				
-A	Cover of binder & documents re: Employer Identification Number from IRS				
-B	Corporate formation documents for Dallas Integrated Medical Center dated 10/31/14				
-C	8/11/14 email from "Daniela W. <daniela@mobilemedicalclinic.net> re: I need information for your son and Social Security Number cards for Nathaniel Paul Turley				
-D	TWC invoice for phone, fax, and internet service billed to Nathaniel Turley but directed to Daniela@mobilemedicalclinic.net				
-E	Resume of LaRhonda Loftis with handwritten note: "12/hr – seat warm 14/hr – work"				
-F	Medicare application signature page for Nathaniel Turley				
-G	Pre-signed blank forms				
47.	Physician Supervision Agreement for 7111 Medical Clinic, Inc. signed by Dr. Anh Do with sticker "Please sign & return to Daniela" (FBI Box G230)				
-a	Picture of Exh. 47, as it was found				

No.	Description	Off.	Obj.	Adm.	N/Adm
48.	Reserved				
49.	Reserved				
50.	List of future clinic names (FBI Box G131)				
51.	10/8/12 Email to “Daniela W.” re: POLYAKOVA E_Bank of America account information (FBI Box G298)				
52.	List of diagnosis codes with note to circle				
	codes you want from Daniela (FBI Box G131)				
53.	List of NPIs for doctors and PAs, clinic email addresses and passwords. (FBI Box G241)				
54.	Binder (FBI Box G131)				
-a	Pre-filled history and physical form				
-b	9/26/13 Email to Daniela@MobileMedicalClinic.net re: asking her if she wants to use the same procedure codes used by the clinics in Chicago (FBI Box G131)				
-c	Highlighted list of procedure codes				
-d	Whited out, pre-signed procedure notes for orthovisc knee injection (FBI Box G131)				
55.	Reserved				
56.	Reserved				
57.	Reserved				
58.	Reserved				
59-A to 59-L	Binder entitled, “SORS Medical Group” (FBI Box G131)				
60-A to 60-M	Binder entitled, “Orcus Medical Imaging, Inc., 7111 Harwin Dr. Ste 287, Houston, TX 77036” containing corporate formation documents (FBI Box G131)				

No.	Description	Off.	Obj.	Adm.	N/Adm
61-A to 61-L	Binder entitled, "Indira Healthcare Services" containing corporate formation documents (FBI Box G131)				
62, 62-a to 62-m	Binder entitled, "Feronia Medical Clinic, Inc." containing corporate formation documents (FBI Box G131)				
63, 63-e, 63-f	Binder entitled "Tellus Healthcare Group Inc." (FBI Box G187)				
64.	10/11 to 11/11 Doctors Preferred bank statement for WFB checking 5645 & savings 0595 (FBI Box G187)				
65.	7/25/12 Doctors Preferred corporate formation records (FBI Box G187)				
66.	4/17/14 Doctors Preferred Diagnostics Texas Workforce Commission records (FBI Box G187)				
67.	Care Plus Clinic tax documents 2012 to 2014 (FBI G187)				
68.	Care Plus Clinic 8-20-12 minutes of annual meeting listing Sonia Reyna as sole director present (FBI Box G187)				
69.	Care Plus 2014 change of registered agent (FBI Box G187)				
70.	Reserved				
71.	Care Plus 7-20-12 Email to Daniela asking her to print the attached IRS form, "Sonia has to sign each page," "Fax it to IRS") (FBI Box G187)				
72.	Binder entitled Daniela's Contacts (FBI Box G226)				
-a	Daniela note re stealing idea for allergy test				
-b	Daniela's notes from binder Daniela's Contacts				

No.	Description	Off.	Obj.	Adm.	N/Adm
73.	1/16/15 to 1/31/15 payroll hours for Gulfton, Care Plus, Village Diagnostics, Horizon Multi- Specialty, 7111 Medical, Doctors Preferred. (FBI Box G298)				
74, 74-a to 74-e	Binder entitled Webtranscribing Inc. containing corporate formation documents (FBI Box G187)				
75, 75-a to 75-c	Binder entitled, "Doctors Preferred Diagnostics, Inc. IDTF containing corporate formation documents (FBI Box G187)				
76, 76-a, 76-b	Binder entitled, "West H Family Clinic Ltd." containing corporate formation documents (FBI Box G187)				
77, 77-a, 77-c	Binder of documents of ANA Diagnostic Center containing corporate formation documents (FBI Box G131)				
78, 78-a, 78-b	Binder entitled, "Apollo Outpatient Services Inc." containing corporate formation documents (FBI Box G131)				
79, 79-a to 79-d	Binder entitled, "Life Span Clinic" containing corporate formation documents				
80, 80-a, 80-b	Folder of documents of "Horizon Multi-Specialty Group Inc." (FBI Box G131)				
81.	Reserved				
82.	Universal Rai Diagnostic documents (FBI Box G131)				
83.	Diagnosis and test order forms with highlighting (FBI Box G230)				
83-a	Diagnosis and test order forms with highlighting, complete packet (FBI Box G230)				
84.	Reserved				

No.	Description	Off.	Obj.	Adm.	N/Adm
85.	Pre-signed face to face form Dallas Integrated Med Center (FBI Box G230)				
86.	Pre-signed physician order form Dallas Integrated Med Center (FBI Box G230)				
87.	Reserved				
88.	Reserved				
88-a	Picture of tower computer with sticker entitled, "Daniela" (FBI Box G305)				
89.	Reserved				
90.	Reserved				
91.	2011 Desk Planner for Daniela Wagner (FBI Box G220)				
92.	Reserved				
93.	2013 Desk Planner (FBI Box G220)				
94.	Sept. 2013 to Sept. 2014 "Jewish Art Calendar" (FBI Box G220)				
95.	Reserved				
96.	Reserved				
97-a to 97-d	Pre-signed forms and pre-filled test results (FBI Box from 7111 Harwin, Ste 125)				
-a	Pre-signed form and pre-filled test results for Village Diagnostic (FBI Box from 7111 Harwin, Ste 125)				
-b	Pre-signed form and pre-filled test results for Apollo (FBI Box from 7111 Harwin, Ste 125)				
-c	Pre-signed form and pre-filled test results for Care Plus (FBI Box from 7111 Harwin, Ste 125)				
-d	Pre-signed form and pre-filled test results for 7111 Medical Clinic (FBI Box from 7111 Harwin, Ste 125)				

No.	Description	Off.	Obj.	Adm.	N/Adm
98.	Reserved				
99.	Reserved				
100.	Reserved				
101.	<p>Summary of checks that Daniela Wagner received from:</p> <ol style="list-style-type: none"> 1. Gulfton Healthcare 2. Apollo Outpatient 3. Advanced Regency 4. Tellus Healthcare 5. 7111 Medical Clinic 6. Life Span Clinic 7. Care Plus Clinic 8. Village Diagnostic 9. Joseph Vadas 10. Horizon Multi 11. Advanced Regency 12. Hillcroft Healthcare 13. Southwest Healthcare 14. West H Family Clinic 15. Feronia Healthcare 				
-a	Spreadsheet of checks that Daniela Wagner received				

No.	Description	Off.	Obj.	Adm.	N/Adm
-b	<p>Copies of 197 checks that Daniela Wagner received from:</p> <ol style="list-style-type: none"> 1. Gulfton Healthcare 2. Apollo Outpatient 3. Advanced Regency 4. Tellus Healthcare 5. 7111 Medical Clinic 6. Life Span Clinic 7. Care Plus Clinic 8. Village Diagnostic 9. Joseph Vadas 10. Horizon Multi 11. Advanced Regency 12. Hillcroft Healthcare 13. Southwest Healthcare 14. West H Family Clinic 15. Feronia Healthcare 				
-c	Graph of payments to Daniela Wagner per year				
102.	Chart illustrating money that Daniela Wagner received from June 2010 to Feb. 2015				
103-a to 103-n	Charts illustrating money that all co-conspirators received (Exhs. 103-a to 103-n).				
104.	Reserved				
-a	Reserved				
105.	Spreadsheet of checks received by Ileana Martinez				
106.	Storage unit photos				
107.	Reserved				
108-a to 108-j	Pictures of 7111 Harwin, Ste 125, 125B, and 125C Houston, TX (Apollo, SORS, and Tellus)				

No.	Description	Off.	Obj.	Adm.	N/Adm
109-a to 109-n	1099-MISC tax forms and envelopes (Exhs. 109-a to 109-n) (FBI Box G-207)				
110.	Spreadsheet of Abused Procedures				
111.	Spreadsheet of claims data for 14 beneficiaries				
111-A	Excerpt of Exh. 111 spreadsheet focusing on CPT code 95004 (percutaneous allergy test)				
112.	Floorplan of 2470 Gray Falls Ste 220				
113-A to 113-KK	Pictures of 2470 Gray Falls Ste 220				
114-A to 114-L	Pictures of 2470 Gray Falls Ste 220 Rm G				
115.	Floorplan of 6201 Bonhomme Rd. Ste 472S				
116-A to 116-J	Pictures of 6201 Bonhomme Rd. Ste 472S				
117-A to 117-C	Pictures of Gulfton Healthcare, 6065 Hillcroft Ste 306				
118.	Pictures of Hillcroft Healthcare & Diagnostic, 7111 Harwin Dr., Ste 216				
119.	FBI LOL stickie note (FBI Box G230)				
120-A to 120-H	Color coded folders of blank forms with doctors' signatures pre-signed (FBI Box B13)				
121.	Documentation requirements for Face-to-Face certifications (letter) (FBI Box G230)				
122.	Documentation requirements for Face-to-Face certifications (article) (FBI Box G230)				

No.	Description	Off.	Obj.	Adm.	N/Adm
123.	Spreadsheet listing dates that clinics were placed on pre-payment review				
124.	Reserved				
125.	Reserved				
126.	Reserved				
127.	Reserved				
128.	Reserved				
129.	Reserved				
130.	List of patient folders with ultrasounds (FBI Box G224)				
131-A to 131-C	Yolanda Wilkinson file with audit letter and stickie that says "Daniela needs signed" (FBI Box G224)				
132-A to 132-C	James Burns file with prepayment review letter and stickie that says, "Daniela" (FBI Box G224)				
133-A to 133-C	Delma Walker file with prepayment review letter (FBI Box G224)				
134-A to 134-C	June Holmes file with prepayment review letter (FBI Box G224)				
135-A to 135-B	Marilyn Woodall file with prepayment review letter and stickie that says "Daniela" (FBI Box G224)				
136-A to 136-B	Clyde Chatman file (FBI Box 330)				
137-A to 137-B	Marcus Hubbard file (FBI Box 135)				
138-A to 138-B	Kenneth Flowers file (FBI Box 142)				